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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Plaintiff,
v.

WILLIAM GITTERE, et al.,
Defendants.

Case No. 3:18-cv-00282-MMD-CBC-

MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION TO ENFORCE A PREVIOUS ORDER (ECF NO. 62)

Defendants, Sonya Carrillo, Frank Dreesen, Philip Gang, William Gittere, Steve Green, Jerry Howell, Michael Minev, Ronald Oliver, William Reubart, Bonnie Swadling, Devlin Thompson, Harold Wickham and Brian Williams, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada and Peter E. Dunkley, Deputy Attorney General, hereby submit this Motion for Extension of Time to Respond to Plaintiff's Motion to Enforce a Previous Order. (ECF No. 62). This Motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and pleadings on file in this action.

MEMORANDUM OF POINTS AND AUTHORITIES

I. ARGUMENT

Defendants respectfully requests a thirty (30) day extension of time out from the current deadline of December 4, 2019, to respond to Plaintiff's Motion (ECF No. 62).

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Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows: 1 2 When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court 3 acts, or if a request is made, before the original time or its extension expires; or (B) on motion made after the time has expired if the party failed to act because of 4 excusable neglect. Defendants' request is timely and its nature will not hinder or prejudice Plaintiff's case, but will 5 allow for accurate responses to Plaintiff's Motion. In this case, there is good cause for the extension 7 due to current staffing levels at the Office of the Attorney General. Recently, two deputies attorney general have left the office. After the reassignment of their case loads and the cases' respective 8 deadlines, Defendants respectfully request 30 days to respond to the motion. The new deadline would 9 be January 3, 2020. 10 Defendants' request is timely and its nature will not hinder or prejudice Plaintiff's case, but will 11 allow for a substantive response to Plaintiff's motion. 12 For these reasons, Defendants respectfully request a thirty (30) day extension of time from the 13 current deadline to respond to Plaintiff's motion, with the new deadline of Friday, January 3, 2020. 14 DATED this 4th day of December, 2019. 15 AARON D. FORD 16 Attorney General 17 18 /s/ Peter E. Dunkley By: PETER E. DUNKLEY, Bar No. 11110 19 Deputy Attorney General 20 Attorneys for Defendants 21 22 23 24 25

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U.S. MAGISTRATE JUDGE